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18 **UNITED STATES DISTRICT COURT**
19 **EASTERN DISTRICT OF CALIFORNIA**

20 LARRY BIEGLER an individual;
21 ALYSIA BIEGLER, an individual;

22 *Plaintiffs,*

23 vs.

24 NATIONAL GENERAL
25 INSURANCE COMPANY; and
26 DOES 1 through 20, inclusive

27 *Defendants.*
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CASE NO.: 2:22-CV-00560-MCE-DMC

**STIPULATION AND ORDER TO
CONTINUE CASE DEADLINES**

1 Plaintiffs Larry Biegler and Alysia Biegler and defendants National
2 General Insurance Company and Integon General Insurance Company, by and
3 through their respective counsel of record, stipulate and agree as follows and
4 respectfully request entry of an order giving effect to their stipulation:

5 WHEREAS, the parties stipulated to a schedule on September 14, 2022
6 Joint Rule 26(f) Report (*see* ECF Dkt. No. 21);

7 WHEREAS, there have been no prior requests for continuance of any trial
8 or trial related dates in this matter;

9 WHEREAS, the parties have continued to engage in discovery during this
10 period, including scheduling and taking depositions of multiple witnesses;

11 WHEREAS, the parties are continuing to explore mediation as a means of
12 resolving their disputes;

13 WHEREAS, a continuance of the discovery deadline and, as a result, other
14 case deadlines is necessary to provide the parties with adequate time to explore
15 potential case resolution and to avoid unproductive proceedings and unnecessary
16 litigation costs;

17 WHEREAS, despite the parties being diligently engaged in discovery, the
18 parties have had to reschedule numerous depositions noticed based on party
19 availability, whereabouts, location of the witness, and/or schedule of the witness;

20 WHEREAS, no party will be prejudiced by this first request for a
21 continuance;

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WHEREAS, the parties agree that the interests of judicial economy, efficiency and convenience of the Court and the parties would be furthered by continuing the dates in the in the case management schedule filed on September 14, 2022 (ECF Dkt. No. 21) by approximately 90 days, as follows:

	Original Deadline	Proposed Deadline (Adding 60 Days)
Non-Expert Discovery Cut Off	Tuesday, February 28, 2023	Friday, April 28, 2023
Designation of Expert Witnesses	Friday, January 13, 2023	Tuesday, May 2, 2023
Designation of Rebuttal Experts	Friday, January 27, 2023	Tuesday, May 16, 2023
Expert Discovery Cut off	Friday, February 10, 2023	Friday, June 2, 2023
Discovery & Motion Hearing Cut-off	Thursday, March 2, 2023	Friday, August 1, 2023
Joint Notice of Trial Readiness	30 Days After Ruling on Dispositive Motions	30 Days After Ruling on Dispositive Motions

WHEREAS, the parties agree that all other case deadlines, including trial and motion deadlines, and dates imposed by order, local rules, or otherwise, shall be reset in accordance with the 90 day continuance requested;

NOW, THEREFORE, IT IS AGREED AND STIPULATED that:

The deadlines in this matter, set forth in parties order and all other case deadlines be continued by 90 days as set forth in part in the table above, or as soon thereafter as the Court's calendar allows. Alternatively, the parties

1 respectfully request that the Court set a further case management conference at
2 which new dates may be selected.

3 The parties respectfully request the Court to adopt the foregoing stipulation as
4 the order of the Court.

5 **IT IS SO STIPULATED.**

6 Respectfully submitted,

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9 Dated: January _12_, 2023

RICHARDS WILLIS, PC

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11 By 
12 EVAN WILLIS

13 Attorneys for Plaintiffs
14 LARRY BIEGLER and ALYSIA
15 BIEGLER

16 Dated: January 17, 2023

17 RESNICK & LOUIS P.C.

18 By 
19 ROBERT B. PONZIANO

20 Attorney for Defendant
21 NATIONAL GENERAL INSURANCE
22 and INTEGON GENERAL
23 INSURANCE
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ORDER

Pursuant to the above stipulation, the Court hereby continues the deadlines set forth the parties Joint Rule 26(f) Report and all other case deadlines by 90 days, in part, as follows:

	Original Deadline	Proposed Deadline (Adding 60 Days)
Non-Expert Discovery Cut Off	Tuesday, February 28, 2023	Friday, April 28, 2023
Designation of Expert Witnesses	Friday, January 13, 2023	Tuesday, May 2, 2023
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Expert Discovery Cut off	Friday, February 10, 2023	Friday, June 2, 2023
Discovery & Motion Hearing Cut-off	Thursday, March 2, 2023	Friday, August 1, 2023
Joint Notice of Trial Readiness	30 Days After Ruling on Dispositive Motions	30 Days After Ruling on Dispositive Motions

IT IS SO ORDERED.

DATED: January 19, 2023


 MORRISON C. ENGLAND, JR.
 SENIOR UNITED STATES DISTRICT JUDGE